

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JENNIFER BISHOP**

**Bankruptcy No. 18-11657**

**RESPONSE TO MOTION TO AVOID  
NONPOSSESSORY NONPURCHASE MONEY SECURITY INTEREST**

COMES NOW, First Metropolitan Financial Services - New Albany Branch ("First Metropolitan") and responds to Debtor's Motion to Avoid Nonpossessory, Nonpurchase Money Security Interest and would show unto the Court the following, to wit:

1. First Metropolitan admits that debtor is indebted to it and that it holds a nonpossessory, nonpurchase money security interest in Debtor's property. First Metropolitan denies that all such possessions are exempt and objects to Debtor's claim of exemption for that property which is not exempt pursuant to Miss Code Ann. § 85-3-1, et seq. or other applicable law. First Metropolitan denies that the lien on Debtor's property impairs exemptions to which debtor would be entitled under 11 U.S.C. § 522(b).

2. To the extent that First Metropolitan is not paid the replacement value of its collateral with interest, First Metropolitan rejects debtor's plan.

WHEREFORE, PREMISES CONSIDERED, First Metropolitan Financial Services - New Albany Branch prays that the Debtor's Motion to Avoid Nonpossessory, Nonpurchase Money Security Interest be denied, and requests the Court to grant such other relief as is necessary under the circumstances.

Dated: June 20, 2018

First Metropolitan Financial Services - New Albany Branch

BY: /s/ B. Joey Hood, II  
B. Joey Hood, II  
Its Attorney

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**CERTIFICATE OF SERVICE**

I, B. Joey Hood, II, attorney for First Metropolitan Financial Services - New Albany Branch, do hereby certify that the following have been served electronically via ECF with a copy of the above document.

- |    |                    |   |
|----|--------------------|---|
| 1. | Karen B. Schneller | <u><a href="mailto:karen.schneller@gmail.com">karen.schneller@gmail.com</a></u>         |
| 2. | U.S. Trustee       | <u><a href="mailto:USTPRegion05.AB.ECF@usdoj.gov">USTPRegion05.AB.ECF@usdoj.gov</a></u> |
| 3. | Terre M. Vardaman  | <u><a href="mailto:VARDAMAN13ECF@gmail.com">VARDAMAN13ECF@gmail.com</a></u>             |

Dated: June 20, 2018

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